

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ISIDORE HANDLER,

Defendant.

SUPERSEDING INFORMATION

S1 23 Cr. 004 (JHR)

COUNT ONE
(Conspiracy to Falsify Documents and Records)

The United States Attorney charges:

1. From at least in or about 2016 through at least in or about 2023, in the Southern District of New York and elsewhere, ISIDORE HANDLER, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, falsification of records, in violation of Title 18, United States Code, Section 1519.

2. It was a part and object of the conspiracy that ISIDORE HANDLER, the defendant, and others known and unknown, would and did knowingly alter, destroy, mutilate, conceal, cover up, falsify, and make a false entry in a record and document with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, and in relation to and in contemplation of any such matter.

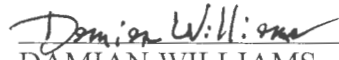
Overt Act

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and

elsewhere:

a. On or about December 21, 2021, ISIDORE HANDLER, the defendant, and others known and unknown, caused a non-profit daycare provider to submit a letter to the regional office of the United States Department of Health and Human Services in New York, New York that contained material falsehoods concerning the daycare provider's oversight of federal funds, among other falsehoods.

(Title 18, United States Code, Section 371.)


DAMIAN WILLIAMS
United States Attorney